

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA,	§	
Plaintiff	§	
	§	
v.	§	Case No. 3:13-CR-00386-B
	§	
ANASTASIO N. LAOUTARIS,	§	
Defendant	§	

DEFENDANT'S SECOND WITNESS LIST

TO THE HONORABLE JANE BOYLE, UNITED STATES DISTRICT JUDGE:

COMES NOW the Defendant ANASTASIO N. LAOUTARIS and files this Defendant's Second Witness List as ordered in the Court's scheduling order. The following persons are probable and potential witnesses in this case, with a brief description as to their proposed testimonies.

<u>WITNESS NAME</u>	<u>PROBABLE/ POSSIBLE</u>	<u>TESTIMONY</u>
1. John Paradysz Houston, Texas	Probable	<u>Fact / Custodial</u> Testimony of Locke Lord computer network and issues; emails and communications about network problems and outages.
2. Kyle Metcalf Dallas, TX	Probable	<u>Fact / Custodial</u> Testimony of Locke Lord computer network and issues; emails and communications

about network problems and outages.

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| 3. Kenny Bradford
Dallas, Texas | Probable | <u>Fact / Custodial</u>
Testimony of Locke Lord
computer network and issues;
emails and communications
about network problems and
outages. Remote log in; and
IT Commandos. |
| 4. Jerry McEachern
Dallas, Texas | Probable | <u>Fact / Custodial</u>
Testimony of Locke Lord
computer network and issues;
emails and communications
about network problems and
outages. |
| 5. Miles Holsworth
Dallas, Texas | Probable | <u>Fact / Custodial</u>
Testimony of Locke Lord
computer network and issues;
emails and communications
about network problems and
outages. |
| 6. Joe Ramos
Houston, Texas | Probable | <u>Fact / custodial</u>
Testimony of Locke Lord
computer network about
problems and outages.
Defendant's employment. |
| 7. Chris Grzadziel
Chicago, Illinois | Probable | <u>Fact / Custodial</u>
Testimony of Locke Lord
computer network and issues;
emails and communications
about network and Laoutaris. |
| 8. Stan Guzik | Probable | <u>Fact / Custodial</u> |

Chicago, Illinois		Testimony of Locke Lord computer network and issues; remote log in and communications about the network. Laoutaris' employment.
9. Michael Ger	Probable	<u>Fact / Custodial</u> Testimony of Locke Lord computer network and issues; emails and communications about network issues. Laoutaris' employment.
Chicago, Illinois		
10. Anthony Le	Probable	<u>Expert</u> Expert testimony about computer networks, log in, network access, IP addresses, smurfing addresses, Log Me In, etc.
Houston, Texas		
11. Ross Cleveland	Probable	<u>Expert</u> Expert testimony about computer networks, log in, network access, IP addresses, smurfing addresses, Log Me In, etc.
Eules, Texas		
12. Custodian of Records/Rep.	Possible	<u>Fact / Custodial</u> The Planet – records and testimony about emails, screens, and IP addresses.
Dallas, Texas		
13. Custodian of Records/Rep.	Possible	<u>Fact / Custodial / Expert</u> Log Me In – records and testimony about Log Me In, remote access, screens, and IP addresses.
14. Retired Agent or Company Rep.	Possible	<u>Expert</u>

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| | | Testimony about computer networks, attacks, infiltrations, compromises, etc. |
| 15. Ernie Kohnke or Custodian/Rep. Probable | | Custodial
Testimony about Trafigura Trading records or lack thereof. |
| 16. Custodian of Records | Possible | <u>Fact / Custodial</u>
Softlayer Technologies records and responses to subpoena. |

/s/ John Teakell
JOHN TEAKELL

Law Office of John R. Teakell
2911 Turtle Creek Blvd.
Suite 300
Dallas, TX 75219
Tele. (214) 523-9076
Fax (214) 523-9077

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Defendant's Second Witness List was served on the U.S. Attorney's Office, Dallas, Texas, and all parties of record, on this 11th day of September, 2015.

/s/ John Teakell
JOHN R. TEAKELL